EPA comments on the Example Calculated Discharge Limits (transmitted on 8/17/21)

1. The first example scenario based on 170 g/year for fish consumption and including a dilution factor (x64) is not acceptable to EPA. Please see EPA comments on the D3 FFS.
2. Please add another example scenario based on TDEC default fish consumption rate (7700 g/yr).
3. The fish consumption rate input to the PRG calculator is in gram/year. It is not necessary to develop a meal size and estimate number of meals. Total grams/year is sufficient. EPA suggests omitting columns C and D.
4. Columns S, T. Please update using the new 2021 DCS values.
5. Column C. Please modify the size of a fish meal to 227 g (approx. 8 oz)
6. Column F. Please modify to 26 years, per the SAP and current EPA CERCLA risk assessment guidelines.
7. Column G. Please footnote or explain the "0" values. EPA assumes 0 represents negative values but would like clarification.
8. Columns L and N. Assimilative capacity: please explain the basis of the 10 and 20 factors. Assimilative capacity is based on the volume of the discharge and the volume of the receiving body at the point of pipe discharge. Please provide the method/calculations for deriving the assimilation values.
9. Column R. Is this monthly mean, annual mean, etc?
10. Please identify the radionuclides that are impacted by background levels. Please identify the radionuclides that may be considered "secondary constituents" for monitoring only, such as constituents that are not site related, have not been detected at the EMWMF and are expected to be infrequent or not present in the EMDF Wastestream, etc.
11. Please identify which radionuclides will be continuous/regular part of the waste stream.